
UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Robert Zajac, MD,
Plaintiff

Case No:20-cv-02148 (JRT-DTS)

v.

Maria K. Statton, Kathryn D. Lombardo,
Hugh P. Renier, Cheryl L. Bailey,
Christopher Burkle, Pamela Gigi,
Pamela Gigi, Shaunequa B. James,
Jennifer Y. Kendall Thomas, Patricia J.
Lindholm, John M. (Jake) Manahan,
Allen G. Rasmussen, Kimberly W.
Spaulding, Stuart T. Williams, in their respective
official capacity as members of the Minnesota
Board of Medical Practice.

Defendants

Declaration of Kathleen M. Ghreichi

I, Kathleen M. Ghreichi, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

1. I am an Assistant Attorney General with the Minnesota Attorney General's Office ("AGO").
2. I represent the Minnesota Board of Medical Practice ("Board") Complaint Review Committee ("Committee") in the above-entitled action.
3. Pursuant to LR 5.6(c)(2), Defendants are filing under temporary seal the attached exhibits in support of Defendants' Joint Memorandum in Opposition to Plaintiff's Motion for Preliminary Injunction. These documents are classified as

confidential in their entirety pursuant to the Minnesota Government Data Practices Act (Minnesota Statutes chapter 13) and the Protective Order issued in the state administrative action (Doc. No. 26-2). These records cannot be meaningfully redacted because redaction would be required of each full page. Furthermore, Defendants' Memorandum is being filed under temporary seal because it contains excerpts from these confidential documents. In compliance with LR 5.6(d)(1)(A)(i), Defendants are also publicly filing a redacted copy of their memorandum.

4. Attached hereto as Exhibit A is a true and correct copy of the complaint concerning Plaintiff's medical practice received by the Board on December 26, 2017 (filed under seal).

5. Attached hereto as Exhibit B is a true and correct copy of the complaint concerning Plaintiff's medical practice received by the Board on October 15, 2018 (filed under seal).

6. Attached hereto as Exhibit C is a true and correct copy of the Committee's Expert Report, submitted in the state administrative action on December 4, 2020 (filed under seal).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on: January 4, 2021

By: /s/ Kathleen M. Ghreichi
KATHLEEN M. GHREICHI (#023834X)

Zajac v. Statton et al.
U.S. District Court File No. 20-cv-02148 (JRT-DTS)

Declaration of Kathleen M. Ghreichi

Exhibit A

CONFIDENTIAL – FILED UNDER SEAL

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Exhibit B

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Exhibit C

CONFIDENTIAL – FILED UNDER SEAL